

Remarks

This responds to the final Office action mailed May 16, 2006 [“the Action”]. Reconsideration of the application is respectfully requested in view of the following remarks. Claims 1-20 are pending in the application. No claims have been allowed. No claims are amended. Claims 1, 2, and 13 are independent.

Cited Art

U.S. Patent No. 6,754,829 to Butt (“Butt”) is entitled “Certificate-Based Authentication System for Heterogenous Environments.”

U.S. Patent No. 6,772,331 to Hind (“Hind”) is entitled “Method and Apparatus for Exclusively Pairing Wireless Devices.”

Amendments

Claim 2 has been amended to clarify aspects of claimed language. Claims 19 and 20 have been added. Additionally, the paragraph beginning at line 28 of page 8 was amended to correct a typographical error. No new matter has been added.

Claims 1-18 Should be Allowable

The Action rejects claims 1-18 under 35 U.S.C. § 103(a) as being unpatentable over Hind in view of Butt. Applicants respectfully submit the claims in their present form are allowable over the cited art. To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. (MPEP § 2142.)

Accordingly, applicants request that all rejections be withdrawn.

Claim 2

Claim 2, as amended, recites, in part,

[A] trust group, the trust group comprising a group of devices, . . .

. . .

transmitting a trust group membership certificate signed by the branding device to the security-uninitialized device via the secured network medium, *the trust group membership certificate containing a signed group name as well as a signed key identifying the security-uninitialized device such that, when the security-uninitialized device sends the trust group certificate to a branded device which is a member of the trust group, the trust group certificate is validated by the branded device, and the branded device verifies that the security-uninitialized device identified in the trust group membership certificate is a member of the trust group of devices referred to by the group name; and*

[Emphasis added.] For example, the Application, at page 35, line 25 to page 36, line 35, describes one example of information contained in a trust group certificate. In the example, the certificate contains information identifying a public key for the group [Application, at page 36, line 22] and the a public key for the device [Application, at page 36, line 15], which in the example is a CD Player. Additionally, at page 36, line 35, the Application notes that the public key can be used as the trust group name.

The application goes on to describe the use of the trust group membership certificate in this example:

When the time comes for the CD to talk directly to the speaker a key exchange happens. The CD sends over its public key and the group membership certificate. The speaker does the same. Both devices are thus able to see that they are members of the same group as certified by the branding device that they have both been instructed to trust. As such the two devices will be willing to communicate with each other.

[Application, at page 36, line 38 to page 37, line 2.]

Butt does not teach or suggest the amended language of claim 2 quoted above because Butt's session certificate contains only user group membership information and thus neither information identifying devices nor information identifying a trust group of devices. In its rejection of claim 2, the Action cites to column 3, line 45 to column 4, line 12 of Butt for the proposition that Butt discloses a certificate that "has group membership to access a certain resource."

However, Butt clearly states that any membership information contained in the session certificate references users and the user groups they belong to. The cited passage describes group membership as follows:

The core issues 56 the newly created session certificate to the console operator. The session certificate contains special account information for the operator, based on the operating system of the core. This information includes the username used to authenticate to the core as well as any of the core's user groups that include this username. . . .

The console operator then forwards 58 a core-signed session certificate to a manageable device Operator identity and group membership is transmitted to the manageable device inside of the signed session certificate. This allows a manageable device to conveniently determine access privileges based on operator group data

[Butt, at column 3, line 55 to column 4, line 7.]

Claim 2 has been amended to clarify that particular information, including “a signed group name” and “a signed key identifying the security-uninitialized device” are found in the certificate. Additionally, claim 2 also recites that, after transmission of the certificate, “the branded device verifies that the security-uninitialized device identified in the trust group membership certificate is a member of the trust group.” Because Butt describes only the sending of user and user group information, Butt cannot teach or describe the language of claim 2 quoted above. Furthermore, the Action does not find “trust group membership certificate” in Hind. For at least these reasons, Hind and Butt, taken alone or in combination fail to teach or suggest every element of claim 2. Thus, claim 2, and its dependent claims 3-12 are allowable. Applicants request that the rejection of claims 2-12 be withdrawn and that claims 2-12 be allowed.

Claim 1

Claim 1 recites, in part:

electronically imprinting the security-uninitialized device with *group membership and cryptographic key data* by the branding device via the secured network medium, *the cryptographic key data for verifying group membership information provided by other devices on the open multi-access network to the security-uninitialized device are authenticated by the branding device*; and

initializing the security-uninitialized device to use the cryptographic key data to authenticate group membership of other devices . . . , and to provide the security-uninitialized device's group membership to such other devices as authentication that the security-uninitialized device is a member of the trust web,

[emphasis added]. In its rejection of claim 1, the Action cites only to the sections cited to in its rejection of claim 2. Furthermore, the Action does not address specific language of claim 1, including the above-quoted language which is not found in claim 2. Thus, the Action does not demonstrate how the combination of Hind and Butt teaches or suggests the quoted language of claim 1. For at least this reason, as well as the reasons cited above with respect to claim 2, Hind and Butt, taken alone or in combination, do not teach or suggest every element of claim 1. Claim 1, and its dependent claim 19, are allowable. Applicants request that the rejection of claim 1 be withdrawn and that claims 1 and 19 be allowed.

Claim 13

Claim 13 recites, in part:

a security resolver operational when initialized with a branding public key to *authenticate trust group membership certificates* provided to the networked computing device from other devices via the network interface using the branding public key, *and further operational to inhibit interaction via the network interface with other devices not authenticated as in the trust group*,...

[emphasis added]. In its rejection of claim 13, the Action cites only to the sections cited to in its rejection of claim 2. Furthermore, the Action does not address specific language of claim 13, including the above-quoted language which is not found in claim 2. Thus, the Action does not demonstrate how the combination of Hind and Butt teaches or suggests the quoted language of claim 13. For at least this reason, as well as the reasons cited above with respect to claim 2, Hind and Butt, taken alone or in combination, do not teach or suggest every element of claim 13. Claim 13, and its dependent claims 14-18 and 20, are allowable. Applicants request that the rejection of claims 13-18 be withdrawn and that claims 13-18 and 20 be allowed.

Request for Interview

In view of the preceding amendments and remarks, Applicants believe the application to be allowable. If any issues remain, however, the Examiner is formally requested to contact the undersigned attorney at (503) 226-7391 prior to issuance of the next communication in order to arrange a telephonic interview. This request is being submitted under MPEP § 713.01, which indicates that an interview may be arranged in advance by a written request.

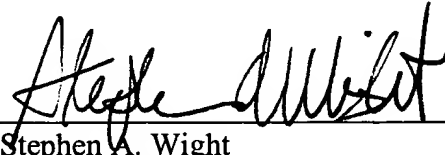
Conclusion

Claims 1-20 should be allowable. Such action is respectfully requested.

Respectfully submitted,

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